



California School
Employees Association



July 14, 2025

Debra Lee, Chief
Division of Occupational Safety and Health
1515 Clay Street, Suite 1901
Oakland, California 94612

Re: Proposed Update to California's Workplace Violence Prevention in All Industries Standard

Dear Chief Lee,

The undersigned unions write regarding the proposed revisions to California's Workplace Violence Prevention All Industries Standard (all industries standard). We oppose the exemptions in subsections (c) 11 (D) through (G) and ask they be removed.

These exceptions exempt employers from conducting debriefings, hazard evaluations, corrective measure assessments, and employee consultations for "involuntary or unintentional type 2 workplace violent incidents that are repetitive," provided no serious injury, death, or use of weapons occurred. This sends a message to employees that if they experience repetitive workplace violence without physical harm, they did not suffer from workplace violence. This is unacceptable.

We understand these exceptions resulted from concerns raised by school districts regarding disabled students. We represent certificated and classified school employees throughout the state, including educators who work in special education classrooms. Unfortunately, many of our members are victims of workplace violence perpetuated by students. These exemptions will allow school districts to ignore repeated incidents such as biting without taking any corrective measures to prevent future incidents. Many of the acts of workplace violence within the school sites are repeated incidents that could have been prevented or mitigated by providing employees with safety equipment. For example, panic buttons and intercoms would allow employees to immediately contact someone for help when they are assaulted. Classified and certificated school employees should also be provided with protective equipment, such as bite-proof shirts when assigned to work with disabled students who regularly bite others. The proposed exemptions will not make school sites safer, in fact not requiring school districts to take these incidents seriously and will reduce the effectiveness of an all-industries standard for school employees.

For these reasons we respectfully ask that the exemptions in subsections (c) 11 (D) through (G) be removed. If you have any questions regarding our position, please contact me at (916) 329-3624 or npuryear@csea.com. Thank you.

Debra Lee, Chief

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Sincerely,



Navnit Puryear
California School Employees Association



Sandra Barreiro
SEIU California



Janice O'Malley
AFSCME California



Michelle Warshaw
California Teachers Association

Via Email to: EBerg@dir.ca.gov